

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
	:	DATE FILED: _____
v.	:	
	:	VIOLATIONS:
	:	8 U.S.C. § 1326(a), (b)(2) (illegal reentry after
	:	deportation - 1 count)
ALPHONSO C. THOMAS	:	18 U.S.C. § 1546(a) (presenting fraudulent
a/k/a “Dennis A. Thomas”	:	identification document to gain entry to
	:	United States - 1 count)
	:	18 U.S.C. § 1028(a)(4) (fraud in connection with
	:	identification documents - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 13, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ALPHONSO C. THOMAS,
a/k/a “Dennis A. Thomas,”**

an alien who had previously been deported from the United States on or about May 31, 1996 and
on or about February 22, 2001, attempted to enter the United States without first applying to the
Attorney General of the United States or his successor, the Secretary for Homeland Security
(Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for
admission, and without receiving in response the express consent of the Attorney General or his
successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a), (b)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 13, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ALPHONSO C. THOMAS,
a/k/a “Dennis A. Thomas,”**

knowingly uttered, used, attempted to use and possessed a document required for entry into and
as evidence of authorized stay and employment in the United States, that is, an alien registration
card issued in the name of Dennis A. Thomas, which the defendant knew to be procured by
means of a false claim and statement and otherwise procured by fraud and unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 13, 2005, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ALPHONSO C. THOMAS,
a/k/a “Dennis A. Thomas,”**

knowingly possessed an identification document other than one issued lawfully for his use, that
is, an alien registration card issued by and under the authority of the United States of America, in
the name of Dennis A. Thomas, with the intent that such document be used to defraud the United
States.

In violation of Title 18, United States Code, Section 1028(a)(4).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney